

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BELLSOUTH)	
TELECOMMUNICATIONS, LLC FOR)	
DECLARATORY ORDER REGARDING)	CASE NO.
INTERCONNECTION WITH CENTRAL)	2015-00227
KENTUCKY NETWORK FOR 911/E911)	
SERVICES TO PUBLIC SAFETY)	
ANSWERING POINTS)	

COMMISSION STAFF'S SUPPLEMENTAL REQUEST FOR INFORMATION TO
BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A AT&T KENTUCKY

BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before May 9, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

AT&T Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T Kentucky fails or refuses to furnish all or part of the requested information, AT&T Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, AT&T Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the response to Lexington-Fayette Urban County Government's Initial Requests for Information to AT&T Kentucky, Item 3.b., where AT&T Kentucky states that routing 911 calls to a selective router is different from routing such calls to an ANI/ALI controller. Refer also to the response to London-Laurel Communication's Center Initial Request for Information to AT&T Kentucky ("London-Laurel's First Request"), Item 1, where AT&T Kentucky distinguishes between delivering 911 calls to a Central Kentucky Network ("CKN") selective router and a CKN host controller. Describe, in detail, how such call routings differ and state whether and how routing to

a selective router or an ANI/ALI controller may affect the need for an interconnection agreement.

2. Refer to the response to Commission Staff's Initial Request for Information ("Staff's First Request"), Item 1.a., where AT&T Kentucky states that it selectively routes calls to the Kentucky State Police ANI/ALI controller, which then delivers the call to call-taking positions on site or to the remote call-taking positions. Explain whether and how the Kentucky State Police's delivery of 911 calls to remote call-taking positions differs from the proposed procedure in which AT&T Kentucky would deliver calls to a CKN controller, which then would deliver calls to remote call-taking positions in the counties served by CKN.

3. Refer to the response to Staff's First Request, Item 3, where AT&T Kentucky states that some states have not required incumbent local exchange carriers ("ILEC") to enter into interconnection agreements with alternative 911 providers. Provide citations to the decisions of those states where the states have determined that ILECs do not need to enter into interconnection agreements with alternative 911 providers.

4. Refer to the response to London-Laurel's First Request, Item 4, which states that AT&T Kentucky has notified CKN of AT&T Kentucky's willingness to negotiate an agreement, either interconnection agreement or commercial agreement, depending upon the Commission's determination. State the status of the negotiations.

Aaron D. Greenwell

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DATED APR 18 2016

cc: Parties of Record

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